

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:23-cr-00027
	:	
Plaintiffs,	:	Judge Sara Lioi
	:	
-vs-	:	
	:	
KENDALE WARE,	:	<b>JOINT MOTION FOR</b>
	:	<b>CONTINUANCE OF CHANGE</b>
	:	<b>OF PLEA HEARING</b>
Defendant.	:	
	:	

Now comes the Defendant, Kendale Ware, by and through undersigned counsel, Justin M. Weatherly, Esq., and hereby respectfully requests this Honorable Court for a Continuance of the Pre-Trial Hearing set for March 8, 2024, in the United States Northern District Court of Ohio for the reasons more fully explained in the Brief in Support, attached hereto and incorporated herein by reference.

Respectfully Submitted,

/s Justin M. Weatherly, Esq.  
JUSTIN M. WEATHERLY Esq.  
Reg. No. 0078343  
HMW Law – Ohio Trial Attorneys  
1231 Superior Avenue East  
Cleveland, Ohio 44114  
(216) 774-0000  
Counsel for Defendant Kendale Ware

**BRIEF IN SUPPORT**

A Change of Plea hearing in the above-captioned matter is currently set for March 8, 2024. Undersigned counsel respectfully requests that this Honorable Court reschedule the hearing in this matter due to the fact that the parties involved in this case are attempting to reach a global resolution as it pertains to the charged and uncharged offenses in this matter. Reaching said resolution requires supervisory approval, which is unlikely to be addressed prior to the currently scheduled hearing. Continuing the Change of Plea hearing in this matter has been discussed with AUSA, Vasile C. Katsaros, Esq., and he has no objections due to circumstances.

WHEREFORE, the Defendant, Kendale Ware by and through undersigned counsel, Justin M. Weatherly, Esq., and for the foregoing reasons, respectfully requests this Honorable Court for an Order continuing the Change of Plea hearing in this matter for thirty (30) days.

Respectfully Submitted,

vas/s/ Justin M. Weatherly  
JUSTIN M. WEATHERLY, Esq.  
Counsel for Defendant Kendale Ware

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically delivered to the following on this 5<sup>th</sup> day of March:

Vasile C. Katsaros  
Ste. 400  
801 Superior Avenue, W  
Cleveland, OH 44113  
216-622-3876  
Fax: 2016-522-8355  
Email: vasile.katsaros@usdoj.gov

/s/ Justin M. Weatherly  
JUSTIN M. WEATHERLY, Esq.  
Counsel for Defendant Kendale Ware